

Decision _____

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA**

Application of San Diego Gas & Electric Company (U902M) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2012.

Application 10-12-005
(Filed December 15, 2010)

And Related Matter.

Application 10-12-006

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM
NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION
(D.) 13-05-010 AND D.13-10-027**

Claimant: The Utility Reform Network (TURN)	For contribution to Decision (D.) 13-05-010 and D.13-10-027
Claimed (\$): 696,795.39	Awarded (\$): 696,442.89
Assigned Commissioner: Michael R. Peevey	Assigned ALJ: John S. Wong

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision:

Decision (D.) 13-05-010: This decision resolved the test year 2012 general rate cases for San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SCG or SoCalGas).¹ The decision adopted Test Year 2012 revenue requirements for SDG&E and SoCalGas. For SDG&E, the Commission authorized a combined gas and electric Test Year 2012 revenue requirement of \$1,732,830,000 which is \$115.9 million below SDG&E's original request. For SoCalGas, the Commission authorized a Test Year 2012 revenue requirement of \$1,958,745,000 which is \$153.7 million below SoCalGas' original request. The decision also adopted post-test year increases for 2013, 2014 and 2015.

¹ The Utility Reform Network (TURN) refers to SDG&E and SoCalGas together as the "Sempra Utilities" or "SEU."

B. Claimant must satisfy Intervenor Compensation requirements set forth in Public Utilities Code §§1801-1812:

	Claimant	CPUC Verified
Timely filing of Notice of Intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	January 31, 2011	Correct
2. Other Specified Date for NOI:	N/A	
3. Date NOI Filed:	March 2, 2011	Correct
4. Was the NOI timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on Administrative Law Judge (ALJ) ruling issued in proceeding number:	Application (A.)10-12-005/ A.10-12-006	Correct
6. Date of ALJ ruling:	November 4, 2011	Correct
7. Based on another CPUC determination (specify):		
8. Has the Claimant demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	Application (A.)10-12-005/ A.10-12-006	Correct
10. Date of ALJ ruling:	November 4, 2011	Correct
11. Based on another CPUC determination (specify):		
12. Has the Claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.13-15-010	(see additional comments)
14. Date of Issuance of Final Order or Decision:	May 14, 2013	Correct
15. File date of compensation request:	July 15, 2013	Correct
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I (use line reference # as appropriate):

#	Claimant	CPUC	Comment
		x	As described in the “General Claim of Reasonableness” section, TURN’s request also seeks compensation for its contribution to D.13-10-027, which at the time of its request had not been adopted by the California Public Utilities

			Commission (Commission). TURN filed a petition for modification of D.13-05-010 on June 26, 2013, which resulted in D.13-10-027.
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PART II: SUBSTANTIAL CONTRIBUTION

A. Claimant's description of its contribution to the final decisions (*see* Public Utilities Code § 1802(i), § 1803(a) & D.98-04-059).

Contribution	Specific References to Claimant's Representations and to Decision	Showing Accepted by CPUC
<p>Overview: This General Rate Case (GRC) proceeding covered an array of issues associated with SDG&E's electric generation and distribution and SoCalGas' gas distribution utility functions. TURN submitted testimony from five witnesses on a wide variety of those issues, and addressed additional issues through our cross-examination of the Sempra Utilities' witnesses during the evidentiary hearings. As TURN will describe in more detail below, TURN's efforts resulted in a substantial contribution on the vast majority of issues addressed in our testimony and briefs.</p> <p>In D.13-05-010, the adopted outcomes on the issues TURN addressed were generally consistent with TURN's recommendation. However, the presentation of the Commission's discussion of the resolution of each issue at times makes it challenging to draw a direct linkage between TURN's advocacy and the adopted outcome. The Commission described its "analysis approach" as a product of the voluminous evidentiary record and extensive briefing. The discussion is focused "on the major points of contention" and does not address every issue that parties raised in the proceeding. However, the decision describes a "review and evaluation process" that enabled the Commission to review and consider the full range of issues parties raised in the proceeding, even if the consideration is not explicit in the decision itself.</p>	D.13-05-010, at 10-12.	Yes

<p>TURN urges the Commission needs to keep this different “analysis approach” in mind as it reviews claims of substantial contribution for intervenor compensation purposes. The task of demonstrating a substantial contribution is compounded where, as here, the substantial contribution is associated either in part or in whole with one of the issues the Commission opted not to address explicitly in the decision. In some of the sections that follow, TURN’s substantial contribution is implicit in the adopted outcome, even though the adopted outcome is an amalgam of the outcomes on a number of smaller issues, with the outcomes not attributed directly to TURN or to any other party.</p> <p>TURN relies largely on our opening briefs² as the source for citations to where the arguments and evidence supporting our substantial contributions appear in the record of this proceeding. The cited pages from those briefs should point the Commission toward the prepared and oral testimony and other record evidence supporting TURN’s position. Should the Commission conclude that it needs further support for any of the substantial contributions described here, TURN requests an opportunity to supplement this showing with additional citations as appropriate.</p>		
<p>1. Overall Outcome</p> <p>For SoCalGas, the Commission authorized a 2012 revenue requirement of \$1.959 billion, as compared to the updated 2012 revenue requirement of \$2.112 billion SoCalGas had requested for that year. TURN can take credit for a substantial portion of this reduction of \$154 million for 2012.</p>	D.13-05-010, at 2-3.	Yes
<p>2. Policy – Forecasting Methodologies</p>	Joint Brief of TURN and UCAN,	Yes

² TURN filed a Joint Brief with Utility Consumers Action Network (UCAN) on a subset of issues common to both utilities, including certain policy issues, and a TURN-only brief on the other issues, mostly specific to SoCalGas.

<p>(Section 3.1)</p> <p>An overarching dispute among many intervenors and the Sempra Utilities was whether a single forecasting method should be the standard approach for developing 2012 forecasts, and the appropriate use of recorded costs for 2010 in the process of developing 2012 forecasts. TURN and UCAN urged the Commission to focus on the goal of the proceeding, which is to develop a reasonable forecast of 2012 costs. If the use of 2010 recorded data serves the purpose of developing a reasonable forecast for 2012 costs, then parties should be permitted to use the 2010 data for that purpose. The Commission adopted TURN's position, and quoted from the Joint Brief of TURN and UCAN in the process.</p>	<p>at 7-16.</p> <p>D.13-05-010, at 17-18.</p>	
<p>3. Gas Distribution Operations – SoCalGas O&M (Section 7.3.2)</p> <p>Field Operations and Maintenance: TURN recommended reductions to SoCalGas' proposed funding levels for the following workgroups: leak survey, measurement and regulation, cathodic protection, service maintenance, and field support.</p> <p>Asset Management: TURN recommended a reduction to SoCalGas' proposed funding levels for Pipeline Operations and Maintenance (O&M).</p> <p>The Proposed Decision (PD) would have adopted funding levels either close to or at the levels recommended by TURN for each of the workgroups for which TURN recommended a reduction. It also would have adopted a funding level close to the level recommended by TURN for asset management.</p> <p>The final decision modified the PD in these areas. For the various workgroups listed above, the Commission increased the authorized funding, in some cases to the amount SoCalGas requested, and in others to a level higher than the PD would have</p>	<p>TURN Opening Brief, at 37-44.</p> <p>PD, at 294-297, 301.</p> <p>D.13-05-010, at 295-299, 303.</p>	<p>Yes</p>

<p>authorized, but still below the figure sought by the utility. The authorization for asset management was increased to the amount SoCalGas had requested.</p>		
<p>4. Gas Distribution Operations – SoCalGas Capital Expenditures (Section 7.3.3)</p> <p>TURN’s general recommendation was that the Commission use recorded results for the 2010 capital project categories. The Commission generally adopted TURN’s position.</p> <p><u>New Business</u>: for 29 Palms, TURN had proposed significantly reduced funding, to which SoCalGas agreed. For other accounts, TURN recommended reductions from SoCalGas’ proposed levels for 2011 and 2012. The Commission explicitly adopted TURN’s position on 29 Palms, and adopted reductions to SoCalGas’ other 2011 and 2012 forecasts in a manner generally consistent with TURN’s recommendations.</p> <p><u>Pressure Betterment, Main and Service Abandonments, Regulator Stations, Cathodic Protection, Meters and Regulators, and Field Support</u>: In each of these accounts, TURN recommended reductions from SoCalGas’ proposed levels for 2011 and 2012. In each case, the Commission adopted TURN’s recommended amount or an amount closer to the TURN recommendation than to the amount originally sought by SoCalGas.</p> <p><u>Supply Line Replacements</u>: TURN recommended reductions from SoCalGas’ proposed levels for 2011 and 2012. The PD would have adopted TURN’s recommended funding levels, but the final decision authorized the amount SoCalGas had requested.</p> <p><u>Equipment and Tools</u>: TURN’s recommended reduction in funding for multigas detectors was not opposed by SoCalGas. The Commission explicitly adopted TURN’s recommendations.</p>	<p>TURN Opening Brief, at 13; D.13-05-010, at 317, 320 (as examples).</p> <p>TURN Opening Brief, at 13-18; D.13-05-010, at 317.</p> <p>TURN Opening Brief, at 18-36; D.13-05-010, at 320, 326, 328, 330, 339-340, 344-345.</p> <p>TURN Opening Brief, at 33; PD, at 320; D.13-05-010, at 322.</p> <p>TURN Opening Brief, at 34-35; D.13-05-010, at 342-343.</p>	<p>Yes</p>

<p>5. Gas Transmission - Operations SoCalGas Pipeline O&M (Section 8.3.2.2.1)</p> <p>TURN joined the Division of Ratepayer Advocates (DRA)³ in opposing SoCalGas' forecast of \$750,000 for removal of abandoned pipelines, providing additional analysis supporting a figure of \$200,000. The PD would have adopted a reduced forecast for this activity, using the \$250,000 DRA had calculated. The final decision included a modification that increased the authorized funding to the full amount SoCalGas had requested.</p>	<p>TURN Opening Brief, at 47-49; PD, at 356-357; D.13-05-010, at 358.</p>	<p>Yes</p>
<p>6. Gas Engineering - Balancing Accounts for Transmission Integrity Management Program (TIMP) and Distribution Integrity Management Program (DIMP) – Sections 9.3.3.2.2.2.3 and 9.3.3.2.2.3.3:</p> <p>TURN recommended that the Commission should adopt one-way balancing accounts for both utilities and, in any event, should ensure a meaningful reasonableness review of any spending above authorized levels. While the Commission adopted two-way balancing accounts, it modified the PD in response to TURN's comments such that a Tier 3 Advice Letter (rather than a Tier 2) is required should either utility seek recovery of any spending above the authorized amount.</p>	<p>Joint Brief of TURN and UCAN, at 24-30; D.13-05-010, at 387, 393, 421-422, and 430, Findings of Fact 183, 185, 188, 190, 202, 204, 206 and 208. (The text of the decision was not modified to reflect the Tier 3 Advice Letter references in the Findings of Fact.)</p>	<p>Yes</p>
<p>7. Gas Safety Reporting – Section 10:</p> <p>TURN asked that the Sempra Utilities be required to submit semi-annual safety report for their transmission and distribution systems, similar to what the Commission has required for PG&E. The decision adopted TURN's proposal.</p>	<p>Joint Brief of TURN and UCAN, at 31-33; D.13-05-010, at 457, and Attachment C.</p>	<p>Yes</p>

³ Effective September 26, 2013, the DRA is now known as the Office of Ratepayer Advocates. (See Stats. 2013, Ch. 356, Section 42.) Since TURN references DRA's activities prior to the name change, we use the DRA label in this decision.

<p>8. Customer Service – SoCalGas Field Service, Call Center and Branch Offices – Section 11.2.3.2</p> <p>TURN recommended a forecast for SoCalGas’ field service operations in 2012 based on 2010 recorded data for all accounts. The forecast was \$1.1 million above the recorded figure for 2009, and \$8.8 million below the amount SoCalGas sought. While the Commission did not adopt TURN’s methodology, it agreed with TURN that the utility’s forecast was too high relative to historical spending. It adopted a forecast that was approximately \$3.75 million below the utility’s request.</p>	<p>TURN Opening Brief, at 57-63; D.13-05-010, at 496-498.</p>	<p>Yes</p>
<p>9. SoCalGas Branch Offices Section 11.2.3.4:</p> <p>TURN recommended a reduced O&M forecast to account for certain staffing reductions. The Commission specifically adopted TURN’s recommended forecast of \$10.619 million, approximately \$500,000 below the amount requested by SoCalGas.</p>	<p>TURN Opening Brief, at 49-56; D.13-05-010, at 505-506.</p>	<p>Yes</p>
<p>10. Customer Service Office Operations Section 11.3.3.2.2.</p> <p><u>Postage</u> - TURN recommended a \$1.3 million reduction to SoCalGas’ postage expense forecast to remove prefunded postage costs. In its rebuttal testimony, SoCalGas agreed that such a reduction was appropriate. The Commission noted this reduction in the decision.</p> <p><u>Bill Delivery</u> – TURN proposed a \$1.1 million reduction to SoCalGas’ forecast for bill delivery expenses, consisting of printing and inserting services associated with bills, notices, and other customer correspondence. The Commission agreed with TURN that a reduction was warranted, and adopted a \$500,000 reduction.</p>	<p>Ex. 550 (Testimony of Jeff Nahigian on Behalf of TURN), at 8-9; Ex. 415 (Rebuttal Testimony of Michael Baldwin on Behalf of SoCalGas), at 17-18; TURN Opening Brief, at 69; D.13-05-010, at 556.</p> <p>TURN Opening Brief, at 69-70; D.13-05-010, at 558.</p>	<p>Yes</p>

<p>11. Customer Information - Nonresidential Markets Section 11.4.3.2.4.3</p> <p>TURN challenged SoCalGas' proposal to use a five-year average as the basis for its forecast of nonresidential market expense, and proposed reliance on 2010 recorded spending levels instead. The Commission agreed with TURN's reasoning that a five-year average may overstate the actual O&M costs, but did not rely on 2010 recorded spending, instead reducing the forecast by \$400,000.</p>	<p>TURN Opening Brief, at 76-77; D.13-05-010, at 628-630.</p>	<p>Yes</p>
<p>12. Customer Information – Research Development & Demonstration (RD&D) – Section 11.4.3.2.5.3</p> <p>TURN recommended a reduction of SoCalGas' Research, Development & Demonstration (RD&D), Operation and Maintenance (O&M) costs to \$5.6 million, rather than the \$13.2 million sought by the utility. The Commission agreed that it made sense to reduce RD&D costs due to the difficult economic circumstances faced by ratepayers, and adopted funding of \$8.6 million, a reduction of \$4.6 million. (The PD would have adopted TURN's recommended funding level, a reduction of \$7.6 million.)</p> <p>TURN's comments on the PD alerted the Commission to its omission of any discussion of the disputed issue regarding the sharing mechanism for net revenues related to RD&D. The Commission found merit in TURN's argument, but revised the sharing to 75/25 (up from 60/40) between ratepayers and shareholders rather than eliminating the sharing mechanism altogether, as TURN had recommended.</p>	<p>TURN Opening Brief, at 77-81; D.13-05-010, at 635-636.</p> <p>TURN Comments on the PD; TURN Opening Brief, at 81-82; D.13-05-010, at 636.</p>	<p>Yes</p>

<p>13. SoCalGas Real Estate, Land and Facilities Capital – Section 14.4.3.3:</p> <p>TURN recommended that the Commission reject the Redlands Headquarter Parking Lot and the Facilities Energy Efficiency proposals due to a lack of evidentiary support; keep the Monterey Park Data Center out of rate base because its completion was not expected until after the 2012 test year was over; and reduce the Natural Gas Vehicle fueling station 2011 and 2012 forecast consistent with 2010 recorded costs.</p> <p>The final decision does not address any specific capital projects. For 2010, the Commission adopts SoCalGas’ latest version of its recorded spending (\$22.7 million projects, down from its forecast of \$27.2 million). (The PD would have adopted TURN’s 2010 number of \$1.9 million.) For 2011 and 2012, the Commission adopted \$38 million and \$19.5 million, respectively. These figures are approximately \$6 million and \$3.4 million below the levels SoCalGas had sought for each of those years. The adopted outcomes were “based on the testimony and arguments of the parties, and our comparison to the historical costs.”</p>	<p>TURN Opening Brief, at 85-96; D.13-05-010, at 734.</p>	<p>Yes</p>
<p>14. SoCalGas Human Resources and Workers’ Compensation Section 14.6.3:</p> <p>Relocation – TURN supported DRA’s recommendation of \$50,000, rather than the \$385,000 forecast SoCalGas presented, based on recorded figures from 2007-09. \$50,000 was approximately the same as the average of the past three years recorded data. The Commission agreed that “historical costs” warranted a reduction to SoCalGas’ forecast, but adopted a smaller reduction of \$100,000.</p> <p>Workers Comp – TURN presented an alternative to DRA’s \$14.4 million forecast based on a five-year average; use the three-year average for medical costs, but</p>	<p>TURN Opening Brief, at 100-102; D.13-05-010, at 757.</p> <p>TURN Opening Brief, at 103-109; D.13-05-010, at. 757.</p>	<p>Yes</p>

<p>SoCalGas' forecast for other subcategories, escalated using a non-labor escalator instead of SoCalGas' medical escalator. TURN's alternative recommendation resulted in a \$15.1 million forecast. The Commission adopted a forecast of \$16.0 million, approximately \$450,000 below the SoCalGas request, "based on historical costs that have been incurred, and the cost drivers which affect these costs."</p>		
<p>15. A&G – Controller, Regulatory Affairs and Finances – Regulatory Affairs Section 14.7.6:</p> <p>TURN and UCAN recommended reductions to the regulatory affairs forecast for SoCalGas and SDG&E based on the use of a 2007-2010 average, plus other specified adjustments. The Commission adopted a smaller reduction of \$150,000 for each of the two utilities.</p>	<p>Joint Brief of TURN and UCAN, at 35-42; D.13-05-010, at 774-776.</p>	<p>Yes</p>
<p>16. A&G – SoCalGas Legal Section 14.8.3.3:</p> <p>TURN challenges SoCalGas' forecast for the Legal Department and proposed a \$1.5 million reduction based largely on the argument that three additional employees are not needed. The Commission was persuaded by TURN's argument that a reduction was in order, but reduced the legal costs by \$600,000 rather than TURN's recommended figure.</p>	<p>Ex. 548 (Testimony of Garrick Jones on Behalf of TURN), at 8-11; D.13-05-010, at 790.</p>	<p>Yes</p>
<p>17. Compensation and Employee Benefits Incentive Compensation Plan and Long-Term Incentive Plan Section 17.2.4:</p> <p>TURN and UCAN recommended that ratepayers fund no more than 50% of the forecasted costs of the Incentive Compensation Plan (ICP) and 0% of the costs of the Long-Term Incentive Plan (LTIP). The PD would have limited the rate recovery to 50% of the ICP forecast, and 0% of LTIP. The final decision reduced the reduction of the ICP forecast to 25%, so</p>	<p>Joint Brief of TURN and UCAN, at 47-63; PD, at 882-884; D.13-05-010, at 882-884.</p>	<p>Yes</p>

ratepayers paid 75% of the forecasted amount. The adopted outcome reduced the authorized amounts for ICP by \$11.4 million for SDG&E, and \$7.2 million for SoCalGas, and for LTIP by \$10.1 million for SDG&E, and \$5.4 million for SoCalGas.		
18. Compensation and Employee Benefits Medical Benefits – Section 17.2.4: TURN supported Disability Rights Advocates' (DRA) forecast for medical benefit expenses, and presented an alternative recommendation in the event the Commission chose not to adopt the DRA forecast. TURN's alternative recommendation was approximately \$64.3 million for SoCalGas. The Commission adopted a forecast of \$63.7 million for SoCalGas, a reduction of approximately \$7.0 million from the amount the utility requested	TURN Opening Brief, at 111-116; D.13-05-010, at 886.	Yes
19. Rate Base – Legacy Meters Section 18.3.2: TURN recommended that the net plant balance associated with electromechanical meters that had been replaced with automated meter infrastructure should be removed from rate base, with the remaining investment amortized over a six-year period, but with no authorized return on the unamortized investment. The Commission adopted a six-year amortization period for the retired legacy meters, at a reduced authorized return of 6.2%.	TURN Opening Brief, at 123-137. D.13-05-010, at 907-914.	Yes

<p>20. Rate Base Issues – SoCalGas Section 18.4</p> <p>TURN raised two issues concerning the rate base of SoCalGas. The Commission did not agree with TURN’s recommendation regarding new business forfeitures, but agreed in part with the recommendation on the number of gas regulators tied to the number of meter sets. This resulted in a reduction of \$700,000 to the regulator forecast amount.</p>	<p>TURN Opening Brief, at 122-123; D.13-05-010, at 918-922.</p>	<p>Yes</p>
<p>21. Depreciation – Section 19</p> <p>TURN and UCAN presented a substantial and detailed showing on depreciation-related issues, analyzing the net salvage rates or average service lives proposed for the largest distribution plant accounts for each utility. DRA did not challenge the average service lives for any of the utility accounts, and limited its challenge of the net salvage rates to two accounts for SDG&E and one for SoCalGas, based on the single issue of the correct treatment of contribution in aid of construction (CIAC) credits. However, the Commission did not adopt any of TURN and UCAN’s recommended depreciation parameters.</p> <p>The standard for an award of intervenor compensation is whether TURN made a substantial contribution to the Commission’s decision, not whether TURN prevailed on a particular issue. For example, the Commission recognized that it “may benefit from an intervenor’s participation even where the Commission did not adopt any of the intervenor’s positions or recommendations.” D.08-04-004 (in the review of Southern California Edison Company’s (SCE) contract with Long Beach Generation [LBG], A.06-11-007, at 5-6. In that case TURN’s opposition focused on the need for the generation resource and its cost-effectiveness. The Commission stated, “The opposition presented by TURN and other</p>	<p>Joint Opening Brief of TURN and UCAN, at 64-103; D.13-05-010, at 927-928 and 935-936.</p>	<p>Yes</p>

<p>intervenor gave us important information regarding all issues that needed to be considered in deciding whether to approve SCE's application. As a result, we were able to fully consider the consequences of adopting or rejecting the LBG Power Purchase Agreement (PPA). Our ability to thoroughly analyze and consider all aspects of the proposed PPA would not have been possible without TURN's participation." (<i>Id.</i>, at 6). On this basis the Commission found that TURN had made a substantial contribution even though its positions had not been adopted, and awarded TURN intervenor compensation for all of the reasonable hours devoted to the proceeding.</p> <p>Similarly, in D.09-10-051 the Commission determined that TURN had made a substantial contribution through its work on depreciation-related issues in the SCE 2009 test year GRC even though it had not adopted TURN's recommendations. There TURN argued that, although the Commission did not adopt TURN's proposal for net salvage values, it should still determine that TURN's efforts on the depreciation issue constituted a substantial contribution to D.09-03-025, the 2009 GRC decision. The decision on TURN's request for compensation in that proceeding indicates that the Commission accepted TURN's argument that such an effort constituted a substantial contribution despite the fact that the Commission did not accept or agree with TURN's recommended outcome. (D.09-10-051, at 8-9.)</p> <p>TURN submits that a similar outcome is warranted here. The joint showing of TURN and UCAN on depreciation-related issues gave the Commission an opportunity to conduct a broader and more thorough review of the utility-proposed depreciation parameters than would have been the case otherwise. Consistent with these other decisions, the Commission should still find that TURN made a substantial contribution</p>		
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<p>warranting an award of intervenor compensation for its work in this proceeding. Just as in the Long Beach case cited above, the Commission's ability to thoroughly analyze and consider all aspects of the proposed depreciation rates would not have been possible without TURN's participation.</p>		
<p>22. Income Taxes – Section 20.4:</p> <p>TURN's cross-examination of the Sempra Utilities tax expert witness uncovered questions regarding how the utilities had applied the carryback and carry forward provisions of the Internal Revenue Code applicable to the treatment of net operating losses. After further informal discussion, TURN and UCAN and the Sempra Utilities submitted a joint exhibit (Exhibit 338) that acknowledged that the correct interpretation of the relevant code sections would result for SDG&E in a \$21.7 million increase to weighted average deferred taxes, and a corresponding reduction to weighted average rate base.</p>	<p>Exhibit 338 (Joint Statement of SDG&E, SoCalGas, TURN and UCAN); Joint Opening Brief of TURN and UCAN, at 105-106; D.13-05-010, at 945, fn. 189.</p>	<p>Yes</p>
<p>23. SoCalGas Miscellaneous Revenues – Section 21.3:</p> <p>TURN recommended a number of adjustments to the SoCalGas forecast of miscellaneous revenues. The utility agreed to several of these adjustments (rent from property, training activity, and partial movement towards TURN's position on revenues from crude oil sales), which resulted in \$1.28 million of increased revenues in the forecast by TURN's calculations. For the residential and commercial parts program, pipeline services, crude oil sales and federal energy retrofit program revenues that remained in disputes, the Commission adopted TURN's methodology and forecasted revenues. The cumulative impact is an increase to miscellaneous revenues (an offset to the authorized revenue requirement) of approximately \$1.5 million.</p>	<p>TURN Opening Brief, at 138-141; D.13-05-010, at 958-962.</p>	<p>Yes</p>

<p>24. Sales and Customers – SoCalGas Section 22.3:</p> <p>TURN forecasted a lower number of customers than did SoCalGas based on more recent building permit data showing less permits than were reflected in the SoCalGas forecast. The Commission agreed with TURN and DRA that it was appropriate to rely on the more recent data, and adopted the DRA-proposed customer forecast and a new meter forecast derived therefrom.</p>	<p>TURN Opening Brief, at 142-148; D.13-05-010, at 972-973.</p>	<p>Yes</p>
<p>25. Non-Tariffed Products and Services (NTP&S) – Section 28:</p> <p>TURN opposed the Sempra Utilities' NTP&S revenue sharing mechanism proposals. The Commission rejected the proposals, agreeing with TURN and Southern California Generation Coalition (SCGC) that the 90% share of revenues for the utilities' shareholders under two of the three mechanisms is too high, and the third mechanism was not reasonable because ratepayers would still be funding up to 50% of the costs but may not see any of the revenues.</p>	<p>Joint Opening Brief of TURN and UCAN, at 125-139; D.13-05-010, at 1018-1025.</p>	<p>Yes</p>
<p>26. Correction to Results of Operation (RO) Model:</p> <p>TURN's review of the PD and the associated RO model indicated what appeared to be a modeling error. The PD denied ratepayer funding for long-term incentive programs, but the RO Model included stock options associated with Corporate Center activities. In an e-mail to the Energy Division, and again in TURN's comments on the PD, TURN pointed out this modeling error resulted in a need for revenue requirement reductions of approximately \$3.4 million for SDG&E and \$3.2 million for SoCalGas. The correction was made in the final decision's RO Model.</p>	<p>Opening Comments of TURN on PD of ALJ Wong, at 8-9.</p>	<p>Yes</p>

B. Duplication of Effort (Public Utilities Code §§ 1801.3(f) & 1802.5):

	Claimant	CPUC Verified
a. Was DRA a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: UCAN, Joint Parties (representing Black Economic Council, National Asian American Coalition, and Hispanic Business Chamber of Commerce of Los Angeles), SCGC, Federal Executive Agencies (FEA), and Utility Workers Union of America (UWUA).		Verified
d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party: TURN's work in a GRC is typically very closely and efficiently coordinated with other like-minded groups, and this case was no different. In light of the scope of the proceeding and the magnitude of the requested rate increase, TURN worked especially hard to achieve such coordination and, as a result, maximum coverage for ratepayers. Our time records include a number of entries (usually coded as "coord" or "GP") for efforts that were primarily devoted to communicating with the other intervenors about matters such as procedural strategies and issue area allocation. As is our regular practice in Sempra GRC-type proceedings, TURN closely coordinated with UCAN from the earliest stages of the GRC in order to avoid and minimize duplication. In some instances, this coordination resulted in TURN assuming primary responsibility for coverage of certain issues common to both applications (for example, depreciation). In other instances, TURN and UCAN submitted joint testimony on common issues, including the general policy, executive compensation and regulatory affairs issues addressed in the joint testimony of William Marcus of JBS Energy. Finally, TURN and UCAN largely relied on the same expert witness firm (JBS Energy) for the review and analysis of a wide array of revenue requirement issues, thus ensuring a more consistent showing on issues that were similar but perhaps not identical between the two utilities. With DRA, avoiding duplication is nearly impossible (since the staff seeks to address nearly all issue areas covered by the utility application). Therefore the coordination effort with DRA aims to minimize duplication and to ensure that where such duplication occurs TURN's witnesses are presenting distinct and unique arguments in support of the common or overlapping recommendations. As a result, the Commission		Verified We find that TURN's participation did not unnecessarily duplicate other parties' efforts.

<p>ended up with a more robust record upon which to evaluate the issue at hand. In most instances, however, TURN raised unique issues, thus broadening the overall presentation of DRA and other intervenors and avoiding duplication altogether.</p> <p>In sum, the Commission should find that TURN's participation was efficiently coordinated with the participation of other intervenors wherever possible, so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenor.</p>	
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C. Additional Comments on Part II:

#	Claimant	CPUC	Comment

PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Claimant except where indicated)

A. General Claim of Reasonableness (§§ 1801 & 1806):

<p>a. Concise explanation as to how the cost of Claimant's participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)</p> <p>TURN's request for intervenor compensation seeks an award of approximately \$700,000 as the reasonable cost of our participation in the proceeding. In light of the scope and quality of TURN's work, and the benefits achieved through TURN's participation in the proceeding, the Commission should have little trouble concluding that the amount requested is reasonable.</p> <p>The Sempra Utilities' application included thousands of pages of testimony and work papers, sponsored by dozens of witnesses. The final exhibit list indicated nearly six hundred exhibits. The combined impact of the utilities' request was an increase of approximately \$475 million as compared to present rate revenues for 2012. The adopted amounts for the 2012 test year were approximately \$270 million below the utilities' request. (D.13-05-010, at 2-3.) As described above in the substantial contribution section, TURN can take credit for a substantial portion of this reduction of \$270 million for 2012. Furthermore, a substantial portion of the savings achieved in the test year will persist throughout the attrition years as well.</p> <p>The Commission could find the amount of TURN's requested award</p>	<p>CPUC Verified</p> <p>Verified</p>
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<p>reasonable even if it limited its review to compare the amount requested with the revenue requirement reductions achieved by those TURN recommendations to which SoCalGas agreed. As TURN's opening brief noted, TURN and SoCalGas agreed upon a \$339,000 reduction for Multigas Detectors in 2010 and 2011 (at 34-35) and a \$1.3 million reduction for the Twenty-Nine Palms Marine Corps Base project in 2010-12 (at 35), both in capital spending, and \$1.277 million of adjustments to miscellaneous revenues (at 138). Assuming the revenue requirement from the capital reductions is approximately 18% of the capital spending amount, the savings on these outcomes alone are approximately \$1.5 million, or more than double the amount of intervenor compensation sought here by TURN.</p> <p>As for the disputed issues in his proceeding, the requested compensation amount is a small fraction of the savings directly and indirectly attributable to TURN's work. As the substantial contribution discussion above makes very clear, TURN's efforts helped achieve a wide array of outcomes where the Commission agreed in whole or in part with TURN's recommendation, most of which resulted in reductions to the authorized revenue requirement.</p> <p>In sum, the Commission should conclude that TURN's overall request is reasonable in light of the substantial benefits to SoCalGas and SDG&E ratepayers that were attributable to TURN's participation in the case.</p>	
<p>b. Reasonableness of Hours Claimed.</p> <p>TURN's attorneys and consultants recorded a substantial number of hours for their work on this GRC. However, this is true of any GRC, as TURN tends to address a very broad array of issues (typically second only to DRA in terms of breadth of coverage but, in this case, likely a close third to UCAN) and devotes substantial time to review of the utility's showing, preparation of discovery, and development of the testimony positions and arguments. As described below and as further reflected in the time records attached to this request, the number of hours for each TURN representative was reasonable under the circumstances present here.</p> <p><u>TURN Attorneys:</u></p> <p>During the early stages of this proceeding Nina Suetake served as TURN's lead and coordinating attorney, as well as covering several issue categories for purposes of testimony review, hearing room work (cross-examination and defending TURN's witness), and briefing. TURN seeks compensation for approximately 150 of her hours here, or the equivalent of approximately 4 weeks of full-time work.</p> <p>Robert Finkelstein played a wide-ranging role for TURN throughout this</p>	<p>Verified</p>

proceeding. He assumed the lead and coordinating role from Ms. Suetake when workload related factors made it impossible for her to continue effectively in that role. Mr. Finkelstein also served as TURN's witness and attorney on the issues related to the reduced rate of return on legacy meters and non-tariffed products and services (NP&S), and was the attorney on those issues as well as depreciation, miscellaneous revenues, and other policy and cost-of-service issues. TURN seeks compensation for approximately 500 of his hours here, or the equivalent of approximately 12-15 weeks of full-time work.

Three other TURN staff attorneys worked on this GRC Tom Long, Marcel Hawiger and Hayley Goodson each assumed responsibility for discrete issue areas (including gas distribution and associated ratemaking and reporting issues for Mr. Long, executive compensation for Mr. Hawiger, and corporate real estate and customer growth for Ms. Goodson). The hours sought for each are reasonable given the scope of their issue coverage in the proceeding.

TURN submits that the recorded hours are reasonable, both as described above and as demonstrated in the wide-ranging substantial contribution TURN made in this proceeding. Therefore, TURN seeks compensation for all of the hours recorded by our attorneys and included in this request.

JBS Energy:

JBS Energy once again played an instrumental role in TURN's participation in this GRC by covering a broad array of issues, and conducting an in-depth review of past spending patterns and forecasts for this GRC.

In recent years TURN's practice in GRCs has been to start our consultant's review as early in the process as practicable, generally after the "Notice of Intent" is filed and before the formal application is submitted. However, because this GRC followed shortly after the 2012 test year GRC for SCE, TURN's ability to pursue such an approach was limited. Still, TURN's consultants engaged in a thorough review of a broad array of issues, with a correspondingly substantial number of hours for the associated work of JBS Energy. This work was a critical part of TURN's success in this proceeding. In light of the breadth of TURN's substantial contribution and the dollar impact of many of the issues on which we prevailed (either in whole or in part), the increased amount of intervenor compensation is a very cost-effective investment for SoCalGas' and, to a lesser extent, SDG&E's ratepayers.

Six members of JBS Energy's staff worked on the Sempra GRCs on behalf

of TURN, with three of them sponsoring testimony on behalf of TURN (and two of them also sponsoring joint testimony on behalf of TURN and UCAN). William Marcus' joint testimony on behalf of TURN and UCAN covered policy issues and O&M spending on regulatory affairs. His TURN-specific testimony included, among other things, gas distribution, meter sets and customer growth capital spending, other distribution capital spending, and field operations and customer contact issues. Jeff Nahigian's testimony covered corporate real estate, customer service back office operations, and royalty sharing for RD&D spending. And Garrick Jones sponsored joint testimony on issues related to the TIMP and DIMP programs, TURN-specific testimony on gas pipelines, relocation, workers compensation, and health benefits costs, as well as performed much of the analysis supporting Mr. Marcus' testimony. In addition, John Sugar, who had recently joined the firm, performed much of the analysis supporting Mr. Marcus' testimony on executive compensation. Gayatri Schilberg recorded a limited number of hours associated with her general review of the showing on the treatment of OpEx 20/20 costs and benefits as part of the firm's overall review of the SoCalGas testimony and GRC showing. Her work did not result in separately-sponsored testimony (although she sponsored testimony on behalf of UCAN on SDG&E-related issues), but served to help define the range of issues TURN would address and to support the efforts of the other members of JBS Energy. And Greg Ruszovan of the firm, whose specialties include data compilation and analysis, recorded a very small number of hours for his work providing critical assistance in support of Mr. Marcus' and Mr. Jones' analysis and testimony.

Diversified Utility Consultants, Inc. (DUCI):

Jack Pous, President of DUCI, bore primary responsibility for the development and presentation of TURN's and UCAN's depreciation testimony in this proceeding, and assisted with preparation of the briefs on those issues. At times Mr. Pous was able to delegate work to Erin Ladd, an associate at the firm, thus reducing the total cost of service to TURN. The total hours for members of DUCI is substantially lower than the figure included in TURN's request for compensation in the 2012 GRC for SCE (250 hours here for two utilities' depreciation showings as compared to 350 total hours in the SCE GRC for the SCE-only work.

Meetings or discussions involving more than one TURN attorney or expert witness:

A relatively small percentage of hours and hourly entries reflect internal and external meetings involving two or more of TURN's attorneys and expert witnesses. In past compensation decisions, the Commission has deemed such entries as reflecting internal duplication that is not eligible for

an award of intervenor compensation. This is not the case here. For the meetings that were among TURN's attorneys and expert witnesses, such meetings are essential to the effective development and implementation of TURN's strategy for this proceeding. None of the attendees are there in a duplicative role – each is an active participant, bringing his or her particular knowledge and expertise to bear on the discussions. As a result, TURN is able to identify issues and angles that would almost certainly never come to mind but for the “group-think” achievable in such settings.

There were also meetings with other parties at which more than one attorney represented TURN on occasion. The Commission should understand that this is often essential in a case such as this one, with a wide range of issues that no single person is likely to master. TURN's requested hours do not include any for a TURN attorney or expert witness where his or her presence at a meeting was not necessary in order to achieve the meeting's purpose. TURN submits that such meetings can be part of an intervenor's effective advocacy before the Commission, and that intervenor compensation can and should be awarded for the time of all participants in such meetings where, as here, each participant needed to be in the meeting to advance the intervenor's advocacy efforts.

Depreciation-related Time:

TURN seeks compensation for the hours associated with work on depreciation-related issues. This includes the hours billed to TURN by DUCI, and hours recorded by TURN's staff attorney Finkelstein who handled the issue on behalf of TURN and UCAN. As TURN explained in the substantial contribution section, under the circumstances the Commission should find that the TURN and UCAN joint showing on depreciation issues constituted a substantial contribution to the proceeding and the Commission's decision, even though the Commission did not adopt the positions TURN and UCAN put forward on depreciation-related issues. And as was the case in D.09-10-051, the decision awarding TURN intervenor compensation for our efforts in the SCE 2009 GRC, the Commission should find the full amount of hours reasonable and compensable.

Petition for Modification Time:

TURN has included in this Request for Compensation approximately 10 hours associated with researching and preparation of the Petition for Modification filed June 26, 2013, after D.13-05-010 issued. TURN is including these hours here based on recent experience that strongly indicates that the Commission is likely to resolve the issue raised in the Petition prior to issuing a final decision on this request for compensation. Should that prove to be the case, the Commission will

know whether TURN's efforts preparing the Petition made a substantial contribution to the Commission's consideration of the issue raised in that petition. Therefore it seemed more efficient for both TURN and the Commission to have TURN include the hours here rather than for TURN to prepare and submit (and the Commission to process) a second request addressing the decision on TURN's Petition for Modification.

Compensation Request Preparation Time:

TURN is requesting compensation for 25.25 hours devoted to compensation-related matters, primarily preparation of this request for compensation (24.5 hours). While higher than the number of hours TURN tends to seek for compensation-related matters, this is a reasonable figure in light of the size and complexity of the request for compensation itself. The number of hours devoted to a request for compensation is driven in large part by the number of individuals and daily time entries involved in the substantive work. For example, the greater the number of individuals and associated time entries, and the greater the likelihood that the request will need to address a new hourly rate for some of those individuals.

In D.09-10-051, the Commission awarded compensation for the full 30.0 hours requested for compensation-related work in the SCE 2009 GRC. However, in the PG&E 2011 GRC the Commission reduced the requested 24.25 hours by 15%, in part due to perceived deficiencies in TURN's claim, and in part due to a determination that the "claim was not complex from the legal standpoint and the formal record in support of the claim was not voluminous." (D.12-03-024 at 25-26.) TURN has striven to fully address issues that have in the past caused the Commission to find deficiencies in our requests for compensation. Given the nearly 900-page final decision, with more than 1000 separately stated findings of fact and over 550 conclusions of law, and TURN's 400-page opening brief based on testimony of six witnesses and extensive references to the hearing testimony of many more witnesses, TURN is confident that the Commission will not reach the same conclusion about the formal record for this claim.

Mr. Finkelstein prepared this request for compensation because his extensive knowledge of many aspects of this proceeding, combined with his experience with GRCs in general, would enable him to prepare the request in a more efficient manner than if it were prepared by one of the other attorneys. Furthermore, each of TURN's attorneys devoted time to reviewing hourly records and identifying and explaining substantial contributions; TURN has excluded the bulk of those hours from this request. Finally, the number of hours requested, while higher than the figure in a typical TURN request for compensation, is lower because of the efficiencies TURN was able to achieve due to having prepared and

<p>submitted a request in the SCE 2012 test year GRC earlier this year.</p> <p>In sum, the Commission should find that the number of hours claimed is fully reasonable in light of the complexity of the issues and TURN's relative success on the merits.</p>	
<p>c. Allocation of Hours by Issue</p> <p>TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to general activities that are part of nearly all CPUC proceedings, such as tasks associated with general participation, procedural matters, and coordination with other parties, as well as the specific substantive issue and activity areas addressed by TURN in his proceeding.</p> <p>Code Stands for:</p> <p>GP General Participation – work that would not vary with the number of issues that TURN addresses, for the most part. This code appears most regularly during early stages of broad reviews, such as the initial review or the application and testimony, rebuttal testimony, and opening briefs, and other tasks that are of a more general nature.</p> <p>GH General Hearing – Hearing-related (preparation and participation), but not issue-specific. There are a number of general tasks that fall upon any intervenor actively participating in evidentiary hearings, such as dealing with scheduling and similar issues. In addition, due to the nature of GRC hearings and witness scheduling, TURN attorneys spent time in the hearing room waiting for the witness they would cross-examine to take the stand. To the extent possible, TURN's attorneys used the time in the hearing room to perform other substantive work (such as preparing for the next witness in queue), with the time recorded to the related substantive issue.</p> <p>Comp Ex Comparison Exhibit – Preparation of TURN positions for inclusion in Comparison Exhibit; review of draft of exhibit.</p> <p>PD Proposed Decision – work on reviewing, analyzing, commenting on, lobbying on, strategizing on the PD and revisions thereto.</p> <p>Proc Procedural – Procedural matters (such as the Sempra Utilities' motion for a memorandum account), non-hearing scheduling matters, joint briefing outline, non-disclosure agreement and</p>	<p>Verified</p>

	other confidentiality issues, etc.	
Coord	Coordination with other parties – meetings and e-mails with DRA, UCAN, and other intervenors about issue coverage, etc.	
Policy	Substantive work on policy issues, including appropriateness of using 2010 data.	
NTP&S	Non-tariffed Products and Services.	
A&G	Administrative and General, including Corporate Center.	
Misc Revs	Miscellaneous Revenues	
RB	Rate base – TURN’s focus on rate base issues was more limited than in past GRCs. An example of an issue falling into this category here was the treatment of new business forfeitures.	
Dep	Depreciation – TURN’s attorney’s time sheets reflect allocation to a general depreciation category. All of the work of Mr. Pous and Ms. Ladd would fall into this general category. Mr. Pous and Ms. Ladd’s time is further allocated to general depreciation (GD), average service lives (ASL), and net salvage (NS). Mr. Pous’ work often involved both ASL and NS-related issues in a manner that made such allocation to one or the other more challenging. These entries are given a dual code (ASL/NS) and, if necessary, should be allocated 50/50 between those two issue areas.	
Tax	Payroll, income, and other tax issues.	
CustServ	Customer Service and Customer Information, including customer service office, billing, and RD&D. This category also includes review and research efforts tied to TURN’s review of the performance of Operational Excellence (OpEx) 20/20 program in determining the range of issues we would address in the proceeding.	
Meters	Ratemaking treatment of removed legacy meters.	
Update	Issues covered by update testimony, participation in update hearings.	
HR	Human Resources – pensions and benefits, medical costs,	

	workers comp, relocation benefits, etc.	
Exec Comp	Executive Compensation – Long-term and short-term incentive payments, etc.	
Gas Dist	Gas Distribution, including TIMP/DIMP balancing account issues.	
Gas Trans	Gas Transmission and Engineering, including pipeline safety, reporting and ratemaking requirements.	
PTYR	Post Test Year Ratemaking, including the productivity sharing mechanism proposed by the Sempra Utilities.	
Sett	Review of settlements reached by other parties to assess need to comment or protest.	
ElecDist	Three entries reflecting TURN's reply brief response to the incentive mechanism CUE proposed for SDG&E.	
PetMod	TURN's petition for modification of D.13-05-010 to correct error in calculation of return on removed legacy meters.	
Sales-Cust	Includes forecast of customers, new meter sets, and related capital forecasting issues.	
Comp	Time devoted to compensation-related pleadings.	
#	Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. In this proceeding the time entries coded # represent a small portion of the total hours. TURN requests compensation for all of the time included in this request for compensation, and therefore does not believe allocation of the time associated with these entries is necessary. However, if such allocation needs to occur, TURN proposes that the Commission allocate these entries in equal 25% shares to the broader issue-specific categories described above that were most likely to have work covered by a # entry (Gas Dist, Gas Trans, CustServ, and A&G).	
TURN submits that under the circumstances, this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.		

B. Specific Claim:

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES*								
Item	Year	Hours	Rate	Basis for Rate**	Total \$	Hours	Rate	Total \$
Marcel Hawiger	2011	14.0	\$350	D.12-05-034	\$4,900.00	14.0	\$350	\$4,900.00
Marcel Hawiger	2012	19.75	\$375	See Comment 1, below.	\$7,406.25	19.75	\$375	\$7,406.25
Marcel Hawiger	2013	5.0	\$400	See Comment 1, below.	\$2,000.00	5.0	\$400	\$2,000.00
Robert Finkelstein	2010	11.25	\$470	D.10-09-042	\$5,287.50	11.25	\$470	\$5,287.50
Robert Finkelstein	2011	188.75	\$470	D.12-03-024	\$88,712.50	188.75	\$470	\$88,712.50
Robert Finkelstein	2012	233.5	\$480	Resolution ALJ-281	\$112,080.00	233.5	\$480	\$112,080.00
Robert Finkelstein	2013	58.5	\$490	Resolution ALJ-287	\$28,665.00	58.5	\$490	\$28,665.00
Hayley Goodson	2010	0.5	\$295	D.10-12-015	\$147.50	0.5	\$295	\$147.50
Hayley Goodson	2011	70.5	\$300	Pending in A.11-05-017	\$21,150.00	70.5	\$295	\$20,797.50 ⁴
Hayley Goodson	2012	78.5	\$325	Pending in A.11-05-017	\$25,512.50	78.5	\$325	\$25,512.50
Hayley Goodson	2013	19.0	\$340	Pending in A.11-06-007	\$6,460.00	19.0	\$340	\$6,460.00
Nina Suetake	2010	5.75	\$280	D.11-05-044	\$1,610.00	5.75	\$280	\$1,610.00
Nina Suetake	2011	62.75	\$295	D.12-05-033	\$18,511.25	62.75	\$295	\$18,511.25
Nina Suetake	2012	79.75	\$315	See Comment 1, below.	\$25,121.25	79.75	\$315	\$25,121.25

⁴ See comment in section 19.1.

Nina Suetake	2013	11.75	\$320	Res. ALJ 287	\$3,760.00	11.75	\$320	\$3,760.00
Thomas Long	2011	106.75	\$520	D.13-05-007	\$55,510.00	106.75	\$520	\$55,510.00
Thomas Long	2012	83.5	\$530	Res. ALJ-281	\$44,255.00	83.5	\$530	\$44,255.00
Thomas Long	2013	18.5	\$555	See Comment 1, below.	\$10,267.50	18.5	\$555	\$10,267.50
William Marcus	2011	182.25	\$250	D.12-03-024	\$45,562.50	182.25	\$250	\$45,562.50
William Marcus	2012	42.75	\$260	See Comment 2, below.	\$11,115.00	42.75	\$260	\$11,115.00
William Marcus	2013	12.67	\$265	See Comment 2, below.	\$3,357.55	12.67	\$265	\$3,357.55
Gayatri Schilberg	2011	26.45	\$200	D.12-03-024	\$5,290.00	26.45	\$200	\$5,290.00
Jeff Nahigian	2011	125.00	\$195	See Comment 2, below.	\$24,375.00	125.00	\$195	\$24,375.00
Jeff Nahigian	2012	86.0	\$200	See Comment 2, below.	\$17,200.00	86.0	\$200	\$17,200.00
Jeff Nahigian	2013	1.0	\$205	See Comment 2, below.	\$205.00	1.0	\$205	\$205.00
Garrick Jones	2010	4.28	\$140	D.12-03-024	\$599.20	4.28	\$140	\$599.20
Garrick Jones	2011	201.34	\$140	D.12-03-024	\$28,187.60	201.34	\$140	\$28,187.60
Garrick Jones	2012	28.48	\$150	Request pending in A.10-11-002 (filed 7/13/12).	\$4,272.00	28.48	\$150	\$4,272.00
Garrick Jones	2013	3.01	\$155	See Comment 2, below.	\$466.55	3.01	\$155	\$466.55
Greg Ruzovan	2011	5.17	\$195	D.12-03-024 (for work in 2010)	\$1,008.15	5.17	\$195	\$1,008.15

John Sugar	2011	140.9	\$200	See Comment 2, below.	\$28,180.00	140.9	\$200	\$28,180.00
John Sugar	2012	31.87	\$205	See Comment 2, below.	\$6,533.35	31.87	\$205	\$6,533.35
John Sugar	2013	6.16	\$210	See Comment 2, below.	\$1,293.60	6.16	\$210	\$1,293.60
Jack Pous	2011	206.0	\$225	See Comment 2, below.	\$46,350.00	206.0	\$225	\$46,350.00
Jack Pous	2012	6.0	\$225	See Comment 2, below.	\$1,350.00	6.0	\$225	\$1,350.00
Jack Pous	2013	1.0	\$225	See Comment 2, below.	\$225.00	1.0	\$225	\$225.00
Erin Ladd	2011	41.0	\$75	See Comment 2, below.	\$3,075.00	41.0	\$75	\$3,075.00
				Subtotal	\$690,001.75			\$689,649.25
OTHER FEES								
Item	Year	Hours	Rate	Basis for Rate**	Total \$	Hours	Rate	Total \$
	Subtotal:					Subtotal:		
INTERVENOR COMPENSATION CLAIM PREPARATION ***								
Item	Year	Hours	Rate	Basis for Rate**	Total \$	Hours	Rate	Total \$
Nina Suetake	2011	75	\$147.50	½ 2011 hourly rate	\$110.63	.75	\$147.50	\$110.63
Robert Finkelstein	2013	24.5	\$245	½ 2012 hourly rate	\$6,002.50	24.5	\$245	\$6,002.50
	Subtotal:				\$6,113.13	Subtotal:		\$6,113.13

COSTS

	Item	Detail	Amount	Amount	
	Photocopies	Copies for testimony, pleadings, hearing room exhibits and other proceeding documents.	\$358.40		\$358.40
	Telephone	Calls relating to work on A.10-12-005/006.	\$17.43		\$17.43
	Postage	Mailing costs for pleadings.	\$71.88		\$71.88
	Courier	FedEx overnight delivery – materials sent expedited to Sempra Utilities.	\$40.03		\$40.03
	Lexis/Nexis	Computerized research.	\$192.77		\$192.77
Subtotal:			\$680.51	Subtotal:	\$680.51
TOTAL REQUEST:			\$696,795.39	TOTAL AWARD	\$696,442.89⁵
<p>*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Claimant's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>** If hourly rate based on Commission decision, provide decision number or resolution; otherwise, attach rationale.</p> <p>***Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>					

⁵ See comment in section 19.2.

Attachments Documenting Specific Claim and Comments on Part III (Claimant completes; attachments not attached to final Decision):

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Daily Time Records for Attorneys and Experts
Attachment 3	Cost detail
Comment 1	<p>Hourly Rates for TURN Attorneys:</p> <p>TURN seeks hourly rates for its staff attorneys at levels that the Commission has previously adopted for each individual's work in a given year, or at increased levels for 2012 and consistent with Resolutions ALJ-281 and ALJ-287, respectively. The following describes the basis for the requested rates that have not been previously awarded as of the date of this Request for Compensation.</p> <p><u>Marcel Hawiger:</u> For Mr. Hawiger's work in 2012, TURN seeks an hourly rate of \$375, an increase of 7.2% from the previously awarded rate of \$350 for 2010 and 2011. The increase is the general 2.2% increase provided for in Res. ALJ-281, plus the first of two 5% step increases available with his move in 2010 to the 13+ years' experience tier. For his work in 2013, TURN seeks an hourly rate of \$400, an increase of 7.0% from the requested rate for 2012. The 2013 increase is the general 2.0% increase provided for in Res. ALJ-287, plus the second of two 5% step increases available with his move in 2010 to the 13+ years' experience tier.</p> <p><u>Robert Finkelstein:</u> For Mr. Finkelstein's work in 2013, TURN seeks an hourly rate of \$490, an increase of 2% from the rate requested for his work in 2012. This is the general 2.0% increase provided for in Res. ALJ-287.</p> <p><u>Hayley Goodson:</u> For Ms. Goodson's work in 2011 and 2012, TURN has justified the requested hourly rates in a Request for Compensation pending in A.11-05-017, <i>et al.</i> The \$5 increase for 2011 reflects a step increase while she was in the five to seven years' experience tier (subject to the cap for that tier in that year). The \$25 increase sought for 2012 reflects her move to the 8-12 years' experience tier. Rather than repeat the justification for the requested hourly rate, TURN refers the Commission to the pending request in A.11-05-017, <i>et al.</i> and asks that the relevant material be incorporated by reference as though fully set forth here. Should the Commission wish to see the justification included in this request, TURN requests the opportunity to supplement or amend this request accordingly. For her work in 2013, TURN seeks an hourly rate of \$340, an increase of 7.0% from the requested rate for 2012. The 2013 increase is the general 2.0% increase provided for in Res. ALJ-287, plus the second of two 5% step increases available with her move in 2010 to the 8-12 years' experience tier.</p> <p><u>Nina Suetake:</u> For Ms. Suetake's work in 2012, TURN seeks an hourly rate of \$315, an increase of 7.2% from the previously awarded rate of \$295 for 2011. The increase is the general 2.2% increase provided for in Res. ALJ-281, plus the</p>

	<p>second of two 5% step increases available with her move in 2009 to the five to seven years' experience tier. For Ms. Suetake's work in 2013, TURN seeks an hourly rate of \$320, an increase of 2% from the rate requested for her work in 2012. This is the general 2.0% increase provided for in Res. ALJ-287.</p> <p>Thomas Long: For Mr. Long's work in 2012, TURN seeks an hourly rate of \$530, an increase of 2.2% from the rate recently approved for his work in 2011 in D.13-05-007. This is the general 2.2% increase provided for in Res. ALJ-287. For his work in 2013, TURN seeks an hourly rate of \$555, an increase of 7.0% from the requested rate for 2012. The 2013 increase is the general 2.0% increase provided for in Res. ALJ-287, plus the first of two 5% step increases available in the 13+ years' experience tier.</p>
Comment 2	<p>Hourly Rates for TURN Consultants:</p> <p>For many of the consultants who worked with TURN on this matter, TURN seeks hourly rates at levels that the Commission has previously adopted for each individual's work in a given year, or at an increased level for 2012 and 2013 consistent with Resolutions ALJ-281 and AJ-287. Below TURN more fully discusses the new hourly rates sought for the consultants whose work was so critical to TURN's substantial contributions in this proceeding.</p> <p>JBS Energy:</p> <p><u>William Marcus:</u> From 2008-2011, the rate charged for Mr. Marcus' work was \$250. The Commission authorized compensation using this rate for work performed in 2011 in D.13-05-008. JBS Energy increased Mr. Marcus' hourly rate as of January 1, 2012, by \$10 to \$260, an increase of 4% over the \$250 rate it had charged for his work in 2008, when his rate increased from \$220 to \$250. The Commission approved using the \$250 rate for work performed in 2008 in D.08-11-053 (in the Sempra GRC A.06-12-009). In mid-September 2012, the Commission issued Res. ALJ-281 adopting an across-the-board cost-of-living adjustment (COLA) that permits a 2.2% increase to previously authorized hourly rates. Had JBS Energy increased Mr. Marcus' 2012 hourly rate by 7.2%, TURN could have justified that rate by relying on the COLA plus a 5% increase as the first of the two "step" increases provided for in D.08-04-010 and reaffirmed in Res. ALJ-281. Therefore TURN submits that the Commission should find Mr. Marcus' 2012 hourly rate of \$260 to be reasonable due to its consistency with the COLA and a portion of the step increase provided for in those earlier decisions. Should the Commission wish to see further justification for this increase, TURN requests the opportunity to supplement or amend this request accordingly.</p> <p>JBS Energy changed its rates as of March 1, 2013, and increased Mr. Marcus' rate to \$265 as of that date. The increase is consistent with the 2.0% cost-of-living adjustment the Commission authorized for 2013 in Res. ALJ-287.</p> <p><u>Garrick Jones:</u> The Commission awarded compensation using a \$140 hourly rate for Mr. Jones' work beginning in mid-2010. D.12-03-024. JBS Energy did not change the rate until 2012, when it increased Mr. Jones' rate to \$150. This increase was discussed in some detail in the Request for Compensation filed in</p>

	<p>A.10-11-002 on July 13, 2012.⁶ Rather than repeat the justification for the requested hourly rate, TURN refers the Commission to the pending request in A.10-11-002 and asks that the relevant material be incorporated by reference as though fully set forth here. Should the Commission wish to see the justification included in this request, TURN requests the opportunity to supplement or amend this request accordingly.</p> <p>JBS Energy changed its rates as of March 1, 2013, and increased Mr. Jones' rate to \$155 as of that date. The increase is consistent with the 2.0% COLA the Commission authorized for 2013 in Res. ALJ-287.</p> <p><u>Jeff Nahigian:</u> TURN seeks an hourly rate of \$195 for Mr. Nahigian's work during 2011 in this proceeding, equal to his actual billing rate during this period. This is an increase of \$5 per hour from the \$190 rate authorized for work in 2010. It is also an increase over the amount sought and awarded in R.09-08-009 for a very small number of 2011 hours.⁷ TURN first submitted the request for an hourly rate of \$195 in the request for compensation filed in the SCE GRC (A.10-11-015) in January 2013.</p> <p>The Commission first authorized the \$190 hourly rate for Mr. Nahigian's work in 2008. In the compensation request addressed in the decision that adopted the \$190 rate, TURN had requested a 2008 hourly rate of \$195, consistent with the rate increase JBS Energy had implemented effective at the start of 2008. However, the Commission limited the increase to the 3% COLA increase plus a 5% step increase applied to the \$175 hourly rate that had been adopted for work in 2007.</p> <p>Mr. Nahigian is a Senior Economist with over twenty years of experience in energy-related analysis. He holds a B.S. in Environmental Policy and Analysis and Planning from U.C. Davis, and has been with JBS Energy since 1986. Since then he has analyzed and sponsored testimony on a variety of cost-of-service and rate design issues, and automated meter infrastructure and a variety of demand response issues. Over the years he has also borne substantial responsibility for the review and position development for line extension issues and utility capital spending for corporate real estate forecasts.</p> <p>The Commission retained the \$155-390 range for experts with more than 13 years of experience in 2011. Resolution ALJ-267. With approximately 20 year experience with JBS Energy, Mr. Nahagian would easily fall at least at the mid-point of that range (approximately \$275). Again, as is typical for the rates JBS Energy charges for each of its firm members, the \$195 rate for work performed in 2011 is substantially below the figure one would expect using the scale the Commission had in effect in</p>
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⁶ The increase is justified in part based on Mr. Jones' experience warranting a move to the next tier the Commission has adopted for intervenor compensation purposes.

⁷ TURN's request for compensation in R.09-08-009, filed September 15, 2011, sought \$190 as the hourly rate for Mr. Nahigian's 9.75 hours in 2011. This was due to an internal TURN error that overlooked the actual rate of \$195 that JBS Energy billed TURN for his work in 2011. In D.12-06-036, the Commission awarded the requested rate for Mr. Nahigian's 2011 work. A similar TURN error led to the same outcome in D.13-05-008, the decision awarding TURN compensation in Phase 2 of the PG&E GRC (A.10-03-014).

	<p>2011, and is within the bottom quartile for the ranges for experts with this level of experience. It is also below the rate produced if the Commission were to apply the “5% step increase” approach here (which would produce a \$200 hourly rate).</p> <p>Mr. Nahigian’s experience is most easily compared to that of his colleagues at JBS Energy. He has several years more experience than Mr. Ruzovan (who has a \$195 hourly rate authorized for 2011). He also has approximately the same amount of [experience] in 2011 than did Scott Cratty and Beth Kientzle of Murray & Cratty when the Commission awarded an hourly rate of \$210 for work those individuals performed on behalf of TURN in 2005. (D.06-09-011, in the SBC merger proceeding).</p> <p>The Commission should also approve the \$195 rate for work performed in 2011 because it is the market rate that JBS Energy charges each of its clients for work performed by Mr. Nahigian during that year. The Commission has long recognized that JBS Energy is a unique and valued resource because the firm consistently provides first-rate analysis at cut-rate prices. Mr. Nahigian is typical of the firm, in that he brings decades of direct experience that permits him to provide high quality work on behalf of consumers, and the firm has set his hourly rate at a level far below what one would expect the market rate to be. If the Commission were to approve a lower rate for his work during that period, at some point it can reasonably expect that either JBS Energy will devote less time to Commission proceedings (in favor of more time devoted to work at its usual hourly rates) or TURN will continue to bear a shortfall in cost recovery even as we continue to rely on a firm that charges hourly rates far below what the market would bear for individuals of similar talent and experience.</p> <p>TURN submits that this information is more than sufficient for the Commission to grant the requested increase to Mr. Nahigian’s hourly rate for 2011. However, should the Commission disagree and believe that it needs more information to support the request, TURN asks that we be given an opportunity to provide additional information before a draft decision issues on this compensation request.</p> <p>JBS Energy changed its rates as of September 1, 2012, and increased Mr. Nahigian’s rate to \$200 as of that date. The increase is consistent with the 2.2% cost-of-living adjustment the Commission authorized for 2012 in Res. ALJ-281.</p> <p>JBS Energy changed its rates as of March 1, 2013, and increased Mr. Nahigian’s rate to \$205 as of that date. The increase is consistent with the 2.0% cost-of-living adjustment the Commission authorized for 2013 in Res. ALJ-287.</p> <p><u>John Sugar:</u> This is the third Request for Compensation that includes work performed by John Sugar, who joined JBS Energy in early 2011 after approximately 30 years with Sacramento Municipal Utility District (SMUD) and California Energy Commission (CEC). For work Mr. Sugar performed in 2011 and through August 2012, TURN seeks an hourly rate of \$200; as of September 1, 2012, JBS Energy increased his hourly rate to \$205, and as of March 1, 2013, the firm increased his hourly rate to \$210. TURN seeks these rates because they reflect the market rates that JBS Energy charges all of its clients for work Mr. Sugar performs in 2011, 2012 and 2013, and because they are in the lowest quintile of the</p>
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	<p>\$155-\$390 range the Commission has established for expert witnesses and consultants with more than thirteen years' experience for each of those three years.</p> <p>Mr. Sugar graduated with honors from the University of California, Santa Cruz, with an A.B. degree in economics in 1974. He earned an M.A. in Public Policy from the University of California, Berkeley in 1975. In 1980, he joined SMUD's Conservation Department, supervising program development and evaluation. In 1983, he moved to the Rate Department, developing experimental time-of-use rate programs, and assisting in financings. In 1985, Mr. Sugar joined the Resource Planning Department, developing methodologies to incorporate demand-side programs into the portfolio of resource options available to SMUD. In 1988, Mr. Sugar joined the CEC's Assessments Division, developing and implementing a least-cost methodology for Resource Planning in the Commission's Electricity Report 7. From 1989 through 1993, as Chief Resource Planner, Mr. Sugar was responsible for improving methodological collaboration between Commission staff and parties presenting alternative resource plans. From 1993 to 2011, he managed various efficiency initiatives at the Energy Commission, including managing technical and engineering staff responsible for analysis underlying New Construction Efficiency and Appliance Efficiency standards (1993-1998) and managing the CEC's programs providing Best Practices workshops and energy surveys to industrial users, as well as programs providing loans and technical assistance to local jurisdictions (1999-2011).</p> <p>Mr. Sugar has extensive experience preparing and presenting expert witness testimony on energy-related matters. He prepared and presented formal testimony to the CEC on topics related to the Electricity Reports and on New Construction Efficiency Standards cost-effectiveness, expected impacts and the Standards development process. Since joining JBS Energy he has presented testimony at the CPUC regarding an SDG&E proposal to install utility-owned photovoltaics (PV) (testimony on behalf of UCAN) and a PG&E proposal for Green Option tariff (A.12-04-020). He has also played an instrumental role in helping to develop the testimony sponsored on behalf of TURN and otherwise assist TURN with its work in proceedings as varied as the SCE Catalina Water GRC (A.10-11-009), the Sempra TCAP (A.11-11-002), the Cal-Peco GRC (A.12-02-014), and the GRCs for the four major energy utilities (SCE – A.10-11-015; SCG/SDG&E – A.10-12-005/006; and PG&E – A.12-11-009). Mr. Sugar has also performed work with JBS Energy in regulatory proceedings in Texas and Arkansas.</p> <p>With more than thirty years of direct experience in energy regulatory matters in California, the vast majority of which were while on the staff of the CEC, the Commission should have no trouble authorizing an hourly rate for Mr. Sugar at the <u>upper</u> end of the \$155-\$390 range established for 2011 work by expert witnesses with more than thirteen years of experience. The \$200 rate is in the <u>lowest</u> quintile of this range, once again affirming that JBS Energy charges rates that are very low by any standard.</p> <p>As with Mr. Nahigian (discussed above), Mr. Sugar's experience is most easily compared to that of his colleagues at JBS Energy. He has nearly the same years of experience as Mr. Marcus (who has a \$250 hourly rate authorized for 2011), and</p>
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	<p>more experience than Ms. Schilberg and Mr. Ruzzovan (who have 2011 hourly rates of \$200 and \$195 respectively). Mr. Sugar has substantially more experience in 2011 than did Scott Cratty and Beth Kientzle of Murray & Cratty when the Commission awarded an hourly rate of \$210 for work those individuals performed on behalf of TURN in 2005 (D.06-09-011, in the SBC merger proceeding).</p> <p>And as TURN discussed regarding Mr. Nahigian's rate, the Commission should also approve each of the requested rates because they are the market rates that JBS Energy charges for work performed by Mr. Sugar during those periods. The Commission has long recognized that JBS Energy is a unique and valued resource because the firm consistently provides first-rate analysis at cut-rate prices. Mr. Sugar's addition to the firm continues that tradition; he brings decades of direct experience that permits him to provide high quality work on behalf of consumers, and the firm has set his hourly rate at a level far below what one would expect the market rate to be.</p> <p>TURN submits that this information is more than sufficient for the Commission to grant the requested hourly rate for 2011 and the small increase for post-September 1, 2012 and post-March 1, 2013 (consistent with Res. ALJ-181 and ALJ-187, respectively). However, should the Commission disagree and believe that it needs more information to support the request, TURN asks that we be given an opportunity to provide additional information before a draft decision issues on this compensation request.</p> <p><u>Gayatri Schilberg and Greg Ruzzovan:</u> For each of these members of JBS Energy, TURN seeks compensation for their work performed in 2011 at the hourly rate the Commission has previously approved for Ms. Schilberg's work in that year and for Mr. Ruzzovan's work in 2010. D.12-03-024 (in PG&E GRC A.09-12-020).</p> <p><u>Diversified Utility Consultants, Inc:</u> The Commission has previously awarded TURN intervenor compensation for work performed by Diversified Utility Consultants, Inc. (DUCI) on depreciation-related topics in GRCs. However, there has been no authorized rate for DUCI firm members in more than four years. Therefore, TURN is seeking to establish new rates for the members of the firm who worked on this proceeding. TURN requests hourly rates of \$225 for Jack Pous, the firm's principal, and \$75 for the work of Erin Ladd, an analyst with the firm. These are the same rates that DUCI Energy billed TURN for his work during this period. They are also the same rates sought in the pending request for compensation in the SCE GRC (A.10-11-015), filed in January 2013.</p> <p><u>Jack Pous:</u> As noted earlier, Mr. Pous is President of DUCI. Since 1972, Mr. Pous has worked steadily in the field of utility revenue requirement and ratemaking analysis, first as an employee of Kansas City Power & Light Company, then for ten years in an independent consulting engineering firm, and since 1986 with DUCI, a firm he helped create. As a principal of DUCI, Mr. Pous has presented and prepared numerous electric, gas, and water analyses in both retail and wholesale proceedings, with clients (including public utility commissions) throughout the United States. Appendix A of his prepared testimony (Exhibit TURN-1) sets forth a fuller statement of Mr. Pous' education, experience and qualifications, including a listing of the numerous proceedings in which he has sponsored testimony on</p>
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	<p>depreciation and other topics before a variety of regulatory agencies, including this Commission.</p> <p>Mr. Pous' qualifications and experience on the depreciation-related issue he addressed in this proceeding are directly comparable to those of William Marcus, the Principal Economist with JBS Energy, and Mike Majoros of Snavelly, King, a consulting firm TURN has also used for expert witness services on depreciation-related matters. Mr. Pous' hourly rate of \$225 in 2011 is \$25 below the rate authorized for Mr. Marcus' work since 2008. This is approximately the same difference as existed in SCE's 2003 GRC, when the Commission found the then-requested rate for Mr. Pous' work in 2004 did not exceed the hourly rates for similarly qualified experts and was reasonable. D.05-06-031, at 44-45. For Mr. Majoros, the Commission approved an hourly rate of \$240 for work performed in 2005. D.06-10-018 at 41-42. Given that Mr. Pous' hourly rate continues to be <u>lower</u> than Mr. Marcus' current rate, <u>lower</u> than the rate authorized for a similar witness addressing the same topic for TURN in 2005, and that the rates for all of these top-notch, very experienced expert witnesses are in the lower 50% of the range the Commission has established for intervenor compensation purposes, the Commission should have no trouble finding Mr. Pous' rate of \$225 reasonable for work he performed in 2011 and 2012 in this proceeding.</p> <p>Erin Ladd: Ms. Ladd is an Analyst with DUCI, an entry level position with the firm, with an hourly rate of \$75. She provided technical and analytical assistance to Mr. Pous in the development of his expert testimony and preparation of cross-examination materials for the evidentiary hearings. In D.06-10-018 (at 42-43), the Commission authorized an hourly rate of \$75 for an individual providing similar support services to a depreciation expert witness in 2005. The \$75 hourly rate is below the low end of the range (\$125-\$185) for persons providing expert witness services with zero to six years' experience in 2011. The Commission should find the requested hourly rate reasonable.</p>
Comment 3	<p>Reasonableness of Expenses: TURN seeks recovery of \$680.51 associated with expenses and costs incurred for our work in this proceeding. The postage and photocopying costs are for pleadings or for documents used during the evidentiary hearings (primarily TURN's prepared testimony and cross-examination exhibits). The photocopying cost for TURN-produced copies is calculated at ten cents per page. The Lexis charge is for computerized legal research TURN performed for this proceeding. There was a single courier cost incurred when TURN sent material to the Sempra Utilities to arrive the following business day. TURN submits that each of these expenses is reasonable, and the cumulative level is relatively small for a proceeding of this scope and TURN's level of participation therein.</p>
Comment 4	<p>Level of Detail in Hourly Records: In past compensation awards the Commission has criticized time records for failure to meet the requirements of Rule 17.4, in particular the directive that the time records identify "the specific task performed" and "the issue that the task addresses." (<i>See</i>, for example, D.12-03-024 (Award in PG&E 2011GRC A.09-12-020), at 23.) TURN respectfully submits that this criticism has often been misplaced, as the time records in question are often from the</p>

	<p>early stages of a proceeding when an intervenor's work is largely devoted to an initial broad review for issue spotting purposes. TURN has strived to keep such entries to a minimum. However, during the early stages of any analyst or attorney's work in the proceeding there is likely to be time devoted to the initial review of a particular volume of testimony for which there is not much more detail to report other than "review testimony." Similarly, TURN's consultants often use the volume number of the testimony as a shorthand reference to the subject area. The parties involved in the GRC understand that any testimony labeled SCG-2 is going to be gas distribution-related, and SCG-5 is gas transmission-related. If it would assist with the Commission's review of these records, TURN would be glad to provide a key that lists the various SoCalGas and SDG&E testimony volumes by number and topic for cross-referencing purposes.</p>
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C. CPUC Disallowances, Adjustments, and Comments:

#	Reason
19.1	Hayley Goodson's rate for 2011 was reduced from \$300 to \$295 pursuant to the approved rate in D.12-05-033.
19.2	TURN and UCAN presented joint testimony and a joint brief on several subject areas that were common to both SDG&E and SoCalGas. Since TURN's focus was on SoCalGas, and UCAN's focus was on SDG&E, SoCalGas should pay the entirety of TURN's intervenor compensation award, instead of apportioning some of the award cost to SDG&E to pay for the joint work that TURN and UCAN performed.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(2) and (c)(6))?	Yes

FINDINGS OF FACT

1. The Utility Reform Network's participation in this proceeding did not unnecessarily duplicate other parties' efforts.
2. The Utility Reform Network has made a substantial contribution to Decision (D.) 13-05-010 and D.13-10-027.
3. The requested hourly rates for The Utility Reform Network's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
4. The Utility Reform Network and Utility Consumer's Action Network presented joint testimony and a joint brief on several subject areas that were common to both San Diego Gas & Electric Company and SoCalGas.
5. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
6. The total of reasonable contribution is \$696,442.89.

CONCLUSION OF LAW

1. Since The Utility Reform Network's efforts focused on SoCalGas, and Utility Consumer's Action Network's efforts focused on San Diego Gas & Electric Company, SoCalGas should pay the entirety of The Utility Reform Network's intervenor compensation award, instead of apportioning some of the award cost to San Diego & Electric Company to pay for the joint work that The Utility Reform Network and Utility Consumer's Action Network performed.
2. The Claim, as adjusted herein, satisfies all requirements of Public Utilities Code Sections 1801-1812.

ORDER

1. The claimant, The Utility Reform Network is awarded \$696,442.89.
2. Within 30 days of the effective date of this decision, Southern California Gas Company shall pay the claimant, The Utility Reform Network, the award. Payment

of the award shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning September 28, 2013, the 75th day after the filing of Claimant's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, at Los Angeles, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D.14_____	Modifies Decision?	No
Contribution Decision(s):	D.1305010, D.1310027		
Proceeding(s):	A.1012005, A.1012006		
Author:	ALJ Wong		
Payer(s):	Southern California Gas Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	07/15/2013	\$696,795.39	\$696,442.89	No	Hourly rate reduced in 2011 for one of TURN's attorney.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Marcel	Hawiger	Attorney	TURN	\$350	2011	\$350
Marcel	Hawiger	Attorney	TURN	\$375	2012	\$375
Marcel	Hawiger	Attorney	TURN	\$400	2013	\$400
Robert	Finkelstein	Attorney	TURN	\$470	2010	\$470
Robert	Finkelstein	Attorney	TURN	\$470	2011	\$470
Robert	Finkelstein	Attorney	TURN	\$480	2012	\$480
Robert	Finkelstein	Attorney	TURN	\$490	2013	\$490
Hayley	Goodson	Attorney	TURN	\$295	2010	\$295
Hayley	Goodson	Attorney	TURN	\$300	2011	\$295
Hayley	Goodson	Attorney	TURN	\$325	2012	\$325
Hayley	Goodson	Attorney	TURN	\$340	2013	\$340
Nina	Suetake	Attorney	TURN	\$280	2010	\$280
Nina	Suetake	Attorney	TURN	\$295	2011	\$295
Nina	Suetake	Attorney	TURN	\$315	2012	\$315
Nina	Suetake	Attorney	TURN	\$320	2013	\$320
Thomas	Long	Attorney	TURN	\$520	2011	\$520
Thomas	Long	Attorney	TURN	\$530	2012	\$530
Thomas	Long	Attorney	TURN	\$555	2013	\$555
William	Marcus	Expert	JBS Energy (TURN Consultant)	\$250	2011	\$250

William	Marcus	Expert	JBS Energy (TURN Consultant)	\$260	2012	\$260
William	Marcus	Expert	JBS Energy (TURN Consultant)	\$265	2013	\$265
Gayatri	Schilberg	Expert	JBS Energy (TURN Consultant)	\$200	2011	\$200
Jeff	Nahigian	Expert	JBS Energy (TURN Consultant)	\$195	2011	\$195
Jeff	Nahigian	Expert	JBS Energy (TURN Consultant)	\$200	2012	\$200
Jeff	Nahigian	Expert	JBS Energy (TURN Consultant)	\$205	2013	\$205
Garrick	Jones	Expert	JBS Energy (TURN Consultant)	\$140	2010	\$140
Garrick	Jones	Expert	JBS Energy (TURN Consultant)	\$140	2011	\$140
Garrick	Jones	Expert	JBS Energy (TURN Consultant)	\$150	2012	\$150
Garrick	Jones	Expert	JBS Energy (TURN Consultant)	\$155	2013	\$155
Greg	Ruszovan	Expert	JBS Energy (TURN Consultant)	\$195	2011	\$195
John	Sugar	Expert	JBS Energy (TURN Consultant)	\$200	2011	\$200
John	Sugar	Expert	JBS Energy (TURN Consultant)	\$205	2012	\$205
John	Sugar	Expert	JBS Energy (TURN Consultant)	\$210	2013	\$210
Jack	Pous	Expert	Diversified Utility Consultants, Inc. (TURN Consultant)	\$225	2011	\$225
Jack	Pous	Expert	Diversified Utility Consultants,	\$225	2012	\$225

			Inc. (TURN Consultant)			
Jack	Pous	Expert	Diversified Utility Consultants, Inc. (TURN Consultant)	\$225	2013	\$225
Erin	Ladd	Analyst	Diversified Utility Consultants, Inc. (TURN Consultant)	\$75	2011	\$75

(END OF APPENDIX)